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U S EPA REGION IV COMMENTS ON RESOURCE CONSERVATION AND RECOVERY ACT
REPORT ADDENDUM AND CORRECTIVE MEASURES STUDY COMBINED SOLID WASTE
MANAGEMENT UNIT 70 (SWMU 70) ZONE E CNC CHARLESTON SC

10/31/2002

U S EPA REGION IV

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
61 Forsyth Street SW
REGION 4
Atlanta, Georgia 30303-3104



61 Forsyth St.
Atlanta, Georgia 30303

October 31, 2002

4WD-FFB

Mr. M.A. Hunt
BRAC Environmental Coordinator
Code 18710
Department of the Navy
Southern Division, NAVFAC
2155 Eagle Drive
North Charleston, South Carolina 29419-9010

SUBJ: RFI Report Addendum and Corrective Measures Study
Combined SWMU 70, Zone E
Charleston Naval Complex (CNC) SC0 170 022 560

Dear Mr. Hunt:

The Environmental Protection Agency, Region 4 has reviewed the above referenced document.
Please find our comments enclosed.

Please contact me at (404) 562-8552 or spariosu.dann@epa.gov with any questions or responses regarding this matter.

Sincerely,

Dann J. Spariosu, Ph.D.
Remedial Project Manager

Enclosure

cc: D. Scaturro, SCDHEC
D. Williamson, CH2M-Jones

f:\CNC\Documents\EPA comments\ SWMU 70 ZoE RFIra-CMSwp EPA cmt.doc

RFI Report Addendum and CMS Work Plan
Combined SWMU 70, Zone E
Charleston Naval Complex
North Charleston, South Carolina
September 2002
Revision No. 0

SPECIFIC COMMENTS

1. **Page 5-1, Section 5.1.5, Line 8.** A table has been inserted in the text indicating that lead is a surface soil COC. However, lead was not presented as a COC for any of the receptors discussed in Section 5.1.2. Additionally, lead calculations were not included in Appendix F. A discussion of lead should be included in the text, where appropriate.
2. **Page 5-3, Section 5.1.2, Line 9.** The text states the exposure point concentrations (EPCs) were the 95-percent upper confidence limit (UCL95) on the mean for all media. EPA Region 4 guidance states > if the calculated UCL exceeds the maximum detected value should be used as the concentration term.® Text should be added to this section clarifying the use of the UCL versus the maximum concentration as the EPC. (It is acknowledged that the UCL was less than the maximum for the chemicals).
3. **Table F-6.** There appears to be confusion with concentrations of certain chemicals on this table. For surface soil and combined surface and subsurface soil, the minimum concentrations are listed as being greater than the maximum concentration. The appropriate minimum and maximum concentrations should be included in the table.